UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| THOMAS LUCA, JR., individually and on behalf of all others similarly situated, |)) Case No. 16-cv-746-MRH |
|--|-----------------------------------|
| Plaintiff, |) |
| V. |) |
| WYNDHAM HOTEL GROUP, LLC and WYNDHAM HOTELS & RESORTS, LLC, |) Electronically Filed and Served |
| Defendants. |))) |

JOINT MOTION TO STAY PROCEEDINGS

Plaintiff Thomas Luca, Jr. and Defendants Wyndham Hotel Group, LLC and Wyndham Hotels and Resorts, LLC (collectively, "Wyndham") jointly advise the Court that they have reached an agreement in principle to resolve plaintiff's claims and those of the proposed class. The parties therefore jointly request that the Court stay all deadlines in this matter for 30 days, to allow the parties to finalize the details of their agreement. The deadlines to be stayed include those for: (1) plaintiff's response to Wyndham's motion to exclude the opinions of Dr. Vicki Morwitz, (2) Wyndham's reply in support of its motion to exclude the opinions of Dr. Vicki Morwitz, (3) Wyndham's sur-reply in opposition to class certification, and (4) plaintiff's response to Wyndham's sur-reply. *See* ECF Nos. 170, 175. The parties also respectfully request that the Court adjourn the April 30, 2019 class certification hearing. *See* ECF No. 170. Staying these proceedings will allow the parties to focus their resources on negotiating appropriate settlement documents, and will ensure that the Court's resources are not expended unnecessarily.

On or before April 29, 2019, the parties will update the Court on their progress by doing one of the following: (1) filing a motion for preliminary approval of their proposed class action

settlement; (2) requesting a continuation of the stay, describing the progress made towards settlement and why additional time is necessary; or (3) indicating that a final agreement could not be reached and proposing a schedule for remaining briefing and a hearing on plaintiff's motion for class certification.

Dated: March 29, 2019

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/s/ K. Winn Allen

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Counsel for Plaintiff Thomas Luca, Jr.

CERTIFICATE OF SERVICE

I certify that on March 29, 2019, I electronically filed the foregoing with the Clerk of this Court by using the CM/ECF system, which will accomplish service through the Notice of Electronic Filing for parties and attorneys who are Filing Users.

/s/ K. Winn Allen

K. Winn Allen Counsel for Defendants